

HEART AND STROKE FOUNDATION OF MANITOBA

PRIVACY POLICY

Updated: June 30, 2004

At the Heart and Stroke Foundation of Manitoba (the "Foundation"), we are committed to protecting the privacy and the confidentiality of "Personal Information" that is shared with us by our donors, prospects, event participants and information seekers (our "Customers"). In order to comply with applicable privacy legislation and to instill confidence in our Customers that the Personal Information they entrust to us is safe, we have developed this Privacy Policy. We want our Customers to know why we ask for their Personal Information, how we use it, what safeguards we employ to protect it, and how to contact us with privacy-related questions.

"PERSONAL INFORMATION" AND WHY IT IS COLLECTED:

In this Privacy Policy, "Personal Information" means information about a Customer, as an identifiable individual, excluding his/her name, title and contact information as an employee of an organization. "Personal Information" does not mean information that does not identify a particular individual, such as aggregate statistics or anonymous data or information about a corporation, organization or non-individual.

The Foundation collects, uses, retains and discloses Personal Information for the following purposes:

- to establish and maintain a relationship with individuals as Customers and to communicate with such Customers in respect of that relationship;
- to fulfill the Customer's instructions and wishes in respect of his/her donation to the Foundation, to process a Customer's payment with a financial institution, and to issue an income tax receipt or other documentation that is reasonably required;
- to assist the Foundation in building a wider and stronger donor base, including by trading or exchanging Customers' contact information with like-minded organizations;
- to provide Customers with information and literature related to the Foundation, its programs and fundraising activities, health, heart conditions and stroke conditions;
- to enable the Foundation to maintain adequate accounting and tax records, to administer billing and accounting records, to assess the quality and quantity of the Foundation's operations, programs and fundraising activities, and to have information in such form as the Foundation may reasonably require for its business needs
- to detect and prevent fraud, to safeguard the interests of the Foundation and its employees, volunteers and Customers, and to meet legal, governmental and regulatory requirements; and
- to achieve any other purpose to which a Customer has given his/her consent.

When Personal Information is to be used for a purpose not previously identified, the new purpose will be identified to a Customer prior to its use. The Foundation will first obtain a Customer's consent before the Personal Information is used for that new purpose,

unless the new purpose is required to meet legal, governmental or regulatory requirements.

PERSONAL INFORMATION AND CONSENT:

The Foundation does not collect, use or disclose Personal Information about a Customer without such Customer's consent, except in limited circumstances as outlined in this Privacy Policy, such as when legal, medical or security reasons make it impossible or impractical to obtain consent. The most common methods we use to obtain consent are by Customers submitting completed donation and event participant forms, by Customers providing Personal Information to the Foundation's staff members or staff representatives and volunteers over the phone, and by Customers submitting to the Foundation completed electronic forms available on the Foundation's website.

A Customer may withdraw his/her consent to the collection, use or disclosure of his/her Personal Information at any time, subject to any legal or contractual restrictions and reasonable notice. For example, IF YOU DO NOT WISH TO HAVE YOUR CONTACT INFORMATION PROVIDED TO LIKE-MINDED ORGANIZATIONS, PLEASE CONTACT THE FOUNDATION'S CHIEF PRIVACY OFFICER OR SIMPLY CHECK THE OPT-OUT BOX IN THE APPROPRIATE DONATION OR EVENT PARTICIPANT FORM. As a general rule, to withdraw consent for any particular purpose, a Customer should contact the Foundation's Chief Privacy Officer at **1-888-473-4636**, or at privacy@heartandstroke.mb.ca. The Foundation will inform a Customer of the implications of such withdrawal.

LIMITING COLLECTION AND RETENTION OF PERSONAL INFORMATION:

The Foundation limits the collection of a Customer's Personal Information to that which is necessary for the purposes identified above in this Privacy Policy, or for any additional purpose identified to the Customer before the collection of the Personal Information. As well, Personal Information is not used or disclosed for purposes other than those for which it was originally collected, except with the consent of the individual or as required or permitted by law. Personal information is only retained as long as reasonably required by the Foundation, after which it is destroyed, erased, or rendered anonymous.

DISCLOSURE:

The Foundation will not disclose Personal Information about a Customer to third parties, except in the following limited circumstances:

- Where the Foundation has a Customer's consent, whether express or implied;
- Where disclosure is to agents and third parties who assist the Foundation;
- When the Foundation is required or permitted by law to do so;
- When the Foundation wishes or is required to disclose to fulfill a public duty, such as preventing fraud;
- When the Foundation is protecting or advancing the Foundation's interests in the context of dealings with regulators, governmental bodies, administrative tribunals or courts;
- Where disclosure is under an exception to the requirement for consent expressly set out in applicable laws, such as exception for disclosures necessary to protect human life or safety in an emergency.

In all such cases, the Foundation will only make disclosure to the extent that is necessary to accomplish its purposes or discharge its regulatory, legal or public duty. Whenever possible, the Foundation will require that the party receiving the information provides reasonable assurances that it will respect the privacy of Personal Information in accordance with applicable laws.

ACCURACY:

The Foundation will make reasonable efforts to ensure that a Customer's Personal Information is as accurate, complete, and up-to-date as is necessary for the purposes for which it is collected and used. If a Customer finds any errors in the Foundation's information about him/her, the Customer should contact the Foundation's Chief Privacy Officer. The Foundation will correct or amend any inaccuracies in the Customer's Personal Information, and where appropriate such amended information will be forwarded to any third parties whom the Foundation may have previously misinformed.

SAFEGUARDS:

The Foundation has security safeguards in place designed to protect Customers' Personal Information against loss, theft, unauthorized access, disclosure, copying, use or modification. The nature of the safeguards put in place by the Foundation depends on a number of factors, including the sensitivity, format, location and length of storage of the Personal Information in issue, and such safeguarding measures may include but are not limited to alarm systems, locked cabinets, computer passwords, firewalls and encryption.

ACCOUNTABILITY AND OPENNESS:

The Foundation has appointed a Chief Privacy Officer to oversee the Foundation's compliance with all applicable privacy legislation and this Privacy Policy. The Chief Privacy Officer and those designated by the Chief Privacy Officer (the "Privacy Team") address and investigate questions or concerns regarding the Foundation's Personal Information handling practises. To reach the Foundation's Chief Privacy Officer or a member the Privacy Team, please call **1-888-473-4636**, or email at privacy@heartandstroke.mb.ca. A copy of this Privacy Policy (and any future updates) is available at www.heartandstroke.mb.ca.

CUSTOMER ACCESS:

The Foundation will provide a Customer access to his/her Personal Information. However, the Foundation may refuse a request for access to Personal Information if:

- The information is protected by legal privilege;
- Granting access would reveal confidential commercial information;
- Doing so would reasonably be expected to threaten the privacy or security of another individual;
- The information was collected for purposes related to the detection and prevention of fraud;
- The information was generated in the course of a formal dispute resolution process; or

- The information would likely reveal Personal Information about another individual (unless such Personal Information can be removed, whereas the remaining Personal Information about the Customer making the requests will be provided).

If a Customer's request for personal information is denied, the Customer will be advised in writing of the reasons for the Foundation's refusal.

CHALLENGING COMPLIANCE:

Customers are encouraged and asked to discuss any privacy-related issues with the Foundation's Chief Privacy Officer or a member of the Privacy Team. Upon request, the Foundation will inform a Customer about the procedures in place to receive and respond to complaints or inquiries about the Foundation's policies and practices relating to the handling of Personal Information.

INFORMATION REGARDING WEBSITE PRACTISES:

The principles outlined in the Foundation's Privacy Policy apply to information collected through the Internet and the Foundation's website, with the following qualifications.

The Foundation collects and stores a Customer's e-mail address from any communications that he/she may send to the Foundation and the Foundation may use such e-mail address to communicate with the Customer.

Any links or references to external sites are provided as a convenience and the Foundation assumes no responsibility or liability for such linked sites. These other sites may send their own cookies to users, collect data or solicit personal information. Customers should check the privacy policy of any site they visit for information regarding such site's privacy handling practices.

AMENDMENTS TO THIS PRIVACY POLICY:

The Foundation reserves the right to revise this Privacy Policy at any time. All Customers are encouraged to contact the Foundation to determine if any revisions have been made to this Privacy Policy. This can be ascertained by referring to the date shown at the top of this Privacy Policy.